

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

<i>Baker, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:12-cv-09496	<p>Master File No. 2:12-MD-02327 MDL 2327 WAVE 12 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</p>
<i>Boomhower, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-14886	
<i>Britt, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-01947	
<i>Brown, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-00386	
<i>Buchholz, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-19305	
<i>Bush, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-01937	
<i>Chavez, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-11240	
<i>Dealba, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-19143	
<i>Epstein-Clark, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-14081	
<i>Frietze, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-29513	
<i>Garcia, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-01942	
<i>Greenwell, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-20166	
<i>Grundel, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-28247	

<p><i>Gurrola, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-04826</p>	
<p><i>Hagler, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-19177</p>	
<p><i>Haymart, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-21296</p>	
<p><i>Henderson, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-18418</p>	
<p><i>Hervey, et al. v. Ethicon, Inc. et al.</i> Civil Case No. 2:12-cv-05839</p>	
<p><i>Hogge, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:12-cv-07873</p>	
<p><i>Marston, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:12-cv-09490</p>	
<p><i>Martin, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-00354</p>	
<p><i>Martinez, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-10804</p>	
<p><i>Mattox, et al. v. Ethicon, Inc., et al.</i> Civil Case No 2:13-cv-14913</p>	
<p><i>Mejia, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:15-cv-14436</p>	
<p><i>Miller, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-27841</p>	
<p><i>Morreira, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-01950</p>	
<p><i>Postil v, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:12-cv-09486</p>	
<p><i>Reyna, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-14089</p>	
<p><i>Reynolds, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:15-cv-14756</p>	
<p><i>Sexton, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:15-cv-07505</p>	

<p><i>Siefkas, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:13-cv-20168</p>	
<p><i>Solano, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-14101</p>	
<p><i>Tidler, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-21299</p>	
<p><i>Vasquez, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-00374</p>	
<p><i>Vigil, et al. v. Ethicon, Inc., et al.</i> Civil Case No. 2:14-cv-01060</p>	

PLAINTIFFS' MOTION TO AMEND REMAINING
PTO # 337 SCHEDULING DEADLINES

Plaintiffs in each of the above-captioned matters (collectively, “Plaintiffs”) respectfully submit this Motion to Amend Remaining PTO #337 Scheduling Deadlines (“Motion”).

1. Plaintiffs’ counsel is located in Agoura Hills, California.
2. Severe Santa Ana winds up to 70 mph have been blowing in the area over the past few days, causing several large wildfires to spread quickly. As of the filing of this Motion, there are currently fires burning in nearby Simi Valley, Calabasas and Brentwood, California. Additional fires are likely to erupt nearby in the coming days.
3. As a result of these fires and the record-breaking Santa Ana winds, Plaintiffs’ counsel’s office is currently closed, and will remain closed for the foreseeable future.
4. Some attorneys and staff in Plaintiffs’ counsel’s office are under mandatory evacuation orders from their homes, and additional evacuation orders are expected today and tomorrow. Major freeways into and out of the area have been closed intermittently as a result of the fires, preventing some attorneys and staff from safely making it into the office.

5. Southern California Edison has been cutting off power as needed to the area as a precautionary measure to prevent additional wildfires. Plaintiff's counsel's remote servers have been working intermittently, and it is anticipated they will likely go out in the coming days.

Based on these facts, Plaintiffs in each of the above-captioned cases respectfully request a one-week extension on the remaining deadlines set forth in PTO # 337.

Dated: October 30, 2019

Respectfully submitted,
By: /s/ Alan S. Lazar
Alan S. Lazar, Esq.
Karen I. Gold, Esq.
MARLIN & SALTZMAN, LLP
29800 Agoura Road, Suite 210
Agoura Hills, CA 91301
Telephone: (818) 991-8080
Facsimile: (818) 991-8081
alazar@marlinsaltzman.com
kgold@marlinsaltzman.com
COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2019, a true and correct copy of PLAINTIFFS' MOTION TO AMEND REMAINING PTO # 337 SCHEDULING DEADLINES was served via ECF on all counsel of record.

Respectfully submitted,

DATED: October 30, 2019

MARLIN & SALTZMAN LLP

BY: /s/ Alan Lazar
Alan S. Lazar, Esq.
Karen I. Gold, Esq.
MARLIN & SALTZMAN, LLP
29800 Agoura Road, Suite 210
Agoura Hills, CA 91301
Telephone: (818) 991-8080
Facsimile: (818) 991-8081
alazar@marlinsaltzman.com
kgold@marlinsaltzman.com

COUNSEL FOR PLAINTIFFS